

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

JOHN SULLIVAN,

Defendant

)
) Criminal No. 23cr10039
)

) Violation:
)

) Count One: Hate Crime Acts
) (18 U.S.C. § 249(a)(1))
)

INDICTMENT

COUNT ONE

Hate Crime Acts
(18 U.S.C. § 249(a)(1))

The Grand Jury charges:

On or about December 2, 2022, in Quincy, in the District of Massachusetts, the
defendant,

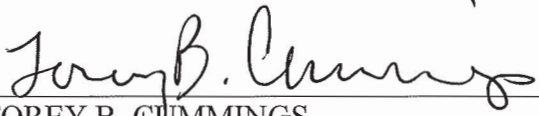
JOHN SULLIVAN,

willfully caused bodily injury to G.N., and attempted to cause bodily injury to G.N. through the
use of a dangerous weapon, to wit, a vehicle, because of G.N.'s actual and perceived race and
national origin.

All in violation of Title 18, United States Code, Section 249(a)(1).

A TRUE BILL


FOREPERSON



TOREY B. CUMMINGS
ASSISTANT U.S. ATTORNEY
DISTRICT OF MASSACHUSETTS

TARA ALLISON
TRIAL ATTORNEY
CIVIL RIGHTS DIVISION

District of Massachusetts: February 15, 2023
Returned into the District Court by the Grand Jurors and filed.

/s/ Noreen A. Russo

DEPUTY CLERK at 2:29 PM